

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JENNIFER FISCHMAN,	:	18-cv-08188
	:	
Plaintiff,	:	
	:	
v.	:	DEFENDANTS' SUPPLEMENTAL
	:	RESPONSES AND OBJECTIONS TO
MITSUBISHI CHEMICAL HOLDINGS	:	PLAINTIFF'S FIRST SET OF
AMERICA, INC.; MITSUBISHI CHEMICAL	:	INTERROGATORIES
CORPORATION; MITSUBISHI CHEMICAL	:	
HOLDINGS CORPORATION; NICHOLAS	:	
OLIVA, in his individual and professional	:	
capacities; DONNA COSTA, in her individual and	:	
professional capacities; and JOHN DOES 1-10, in	:	
their individual and professional capacities,	:	
	:	
Defendants.	:	
	:	
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Pursuant to Rules 26(b) and 33 of the Federal Rules of Civil Procedure (“FRCP”), and Rules 26.2 and 26.3 of the Local Civil Rules for the Southern District of New York (“Local Civil Rules”), defendants MITSUBISHI CHEMICAL HOLDINGS AMERICA, INC (“MCHA”); NICHOLAS OLIVA (“Oliva”) and DONNA COSTA (“Costa”) (collectively, “Defendants”), by and through their attorneys, Gordon Rees Scully Mansukhani, LLP, hereby submit the following supplemental responses and objections to the interrogatories propounded by plaintiff, Jennifer Fischman (“Plaintiff”):

Interrogatory No. 8: Identify all persons employed by Defendant who were in any way involved in Plaintiff’s termination.

Response: Defendants object to this interrogatory on the grounds that it is vague and ambiguous in its use of the phrase “in any way involved,” and because it seeks information that is

not relevant to the claim or defense of any party and is not proportional to the needs of this case. Defendants further object to this interrogatory on the grounds that it seeks information beyond the scope permissible under Local Civil Rule 33.3.

Subject to and without waiving any objections, Defendants identify Oliva, Costa, and Pat Saunders. In addition, after the decision was made, the decision was communicated to Ken Fujiwara, a Mitsubishi Chemical Holdings Corporation employee.

Dated: New York, New York
March 23, 2020

GORDON REES
SCULLY MANSUKHANI, LLP

By: /s/ Mercedes Colwin
Mercedes Colwin
Christopher A. Seacord
Brittany L. Primavera
Attorneys for MCHA Defendants
One Battery Park Plaza, 28th Floor
New York, NY 10004
(212) 269-5500

TO: Valli Kane & Vagnini, LLP
600 Old Country Road, Suite 519
Garden City, New York 11530
Telephone: 516-203-7180
Fax: 516-706-0248
<http://www.vkvlawyers.com>